
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,
Plaintiff

Case No.: CR-09-100 (ADM/JJG)

v.

DEFENDANT'S MOTION IN
LIMINE TO EXCLUDE RULE 404(b)
EVIDENCE

ROBERT DALE GORIS,
Defendant

NOW COMES Defendant Robert Dale Goris (Defendant or Goris) moves this court in limine to prohibit portions of the Government's evidence from being introduced at trial that are irrelevant to the years charged, irrelevant to the factual determinations to be made by the jury, only serve to complicate and already complicated case, may needlessly confuse the jury's understanding of the crimes with which the defendant was charged, violated Sixth Amendment confrontation rights, and are prejudicial. Specifically, the Defendant moves to prohibit the following 404(b) evidence which may be presented by the Government:

1. Defendant's use of Bought with a Price Ministries, a corporation sole;
2. Use of Transport Trust and Land Trust with the assistance of Shawn Rice;
3. Defendant's attempt to place a \$100,000,000,000.00 lien on his property;
4. A 1/19/06 "Security Agreement" filed with the Iowa Secretary of State on 2/15/06;
5. Any of Goris's actions that occurred after the time for the two counts that it has

charged against Goris;

6. A check in the amount of \$3,556,411 sent on a closed bank account to the IRS in 2005;
7. A check in the amount of \$141,035 sent on a closed bank account to the IRS in 2005;
8. Any use of Goris's state tax returns;
9. Goris's subsequent actions related to unrelated years from January of 2004 through the end of 2009 which are not similar to years in question;
10. Allegations in the indictment that are not related to Goris's 2002 and 2003 federal tax returns;
11. Goris's Forms W-8BEN (Certificate of Foreign Status of Nonresident Alien) (postmarked 12/22/08); and
12. Goris's prior actions from January of 1998 through the end of 2000 which are not similar to years in question.

Respectfully submitted on February 22, 2010.

| /s/ Joseph Friedberg
Joseph S. Friedberg, Esq.
Joseph S. Friedberg, Chartered
150 S. 5th St. Ste. 320
Mpls, MN 55402
Tel: 612-339-8626
Fax: 612-339-8627

Deleted: ¶
¶

AND

/s/ Rain Minns
Michael Minns (pro hac vice)
Rain Minns (pro hac vice)
Ashley Arnett (pro hac vice)

Counsel for Defendant
MICHAL LOUIS MINNS PLC
9119 S. Gessner Suite One
Houston, TX 77074
Tel. (713) 777-0772
Fax. (713) 777-0453